

EXHIBIT C

Products that You allege add to the value of the Accused Products that do not embody or require the use of any subject matter claimed in the Asserted Patent.

INTERROGATORY NO. 26: Identify all opinions, evaluations, analyses, or reverse engineering reports, whether written or oral, that Defendant has requested, received, or is aware of regarding any Accused Product, including but not limited to date, author(s), addressee(s), recipient(s), and whether it relates to infringement or non-infringement, validity or invalidity, enforceability or unenforceability, or any other affirmative defense or a valuation of any Accused Product.

INTERROGATORY NO. 27: Identify how each Defendant determines where (*i.e.*, country, city) a sale of an Accused Product occurs, including how such a determination is made within a Defendant's enterprise resource management system or otherwise.

INTERROGATORY NO. 28: Identify and describe any non-infringing alternatives or design-arounds that You allege exist for the patent-in-suit, including whether or not You have implemented any of these alleged non-infringing alternatives or design-arounds.

INTERROGATORY NO. 29: Explain the factual and evidentiary basis for Your inequitable conduct defense, including the factual and evidentiary basis for Your claim that the allegedly non-disclosed art was not cumulative or immaterial and any facts or evidence supporting Your allegation that Plaintiff intended to defraud the patent office.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 28: All corporate records of each Defendant, including but not limited to articles of incorporation, operating agreements, bylaws, amendments, minutes, notes, and resolutions from all corporate meetings, statements of information, stock registers/ledgers (including information on what and when consideration was paid for stock), stock certificates, shareholder buy/sell agreements, annual reports, capital contribution information, dividend payment

Dated: September 30, 2022

Respectfully submitted,

By: /s/ Halima Shukri Ndai

Mark D. Siegmund (SBN 24117055)

Craig Cherry (SBN 24012419)

**STECKLER WAYNE CHERRY & LOVE
PLLC**

8416 Old McGregor Road

Waco, Texas 76712

Tel: (254) 651-3690

Fax: (254) 651-3689

mark@swclaw.com

craig@swclaw.com

Michael W. Shore (SBN 18294915)

Chijioke E. Offor (SBN 24065840)

Halima Shukri Ndai (SBN 24105486)

THE SHORE FIRM

901 Main Street, Suite 3300

Dallas, Texas 75202

Tel: (214) 593-9110

Fax: (214) 593-9111

mshore@shorechan.com

coffor@shorechan.com

hndai@shorechan.com

Brian D. Melton (SBN 24010620)

John P. Lahad (SBN 24068095)

Hayley Stillwell (*pro hac vice*)

SUSMAN GODFREY L.L.P.

1000 Louisiana Street, Suite 5100

Houston, Texas 77002

Tel: (713) 651-9366

Fax: (713) 654-6666

bmelton@susmangodfrey.com

jlahad@susmangodfrey.com

hstillwell@susmangodfrey.com

COUNSEL FOR PLAINTIFF

THE TRUSTEES OF PURDUE UNIVERSITY

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via e-mail on September 30, 2022.

/s/ Halima Shukri Ndai
Halima Shukri Ndai